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Subject Environmental Defense comments on
Tetrabutylhexamethylenediamine (CAS# 27090-63-7)

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Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Tetrabutylhexamethylenediamine (CAS# 27090-63-7)**.

The robust summaries and test plans for tetrabutylhexamethylenediamine (TBHMD) were submitted by Solutia. TBHMD is an intermediate used in the manufacture of BQAOH, which is also covered under the HPV program. BQAOH is used in the manufacture of adiponitrile, which in turn is used in the production of nylon. The sponsor states that there are no other known uses for TBHMD, although it is apparently sold to other customers. The sponsor also states that TBHMD is produced at a single site, although the location of that site was not identified.

The test plans and robust summaries are informative and objective. They identify several gaps in SIDS testing and indicate the sponsor plans to address those gaps with additional studies. Those studies include ecotoxicity (fish, aquatic invertebrates and algae), biodegradation, genetic toxicity and reproductive/developmental toxicity.

We agree with the test plan and we offer the following additional comments:

1. TBHMD is predicted by EcoSAR modeling to possess a high degree of toxicity to fish and aquatic invertebrates (ug/L range). Therefore, we agree with the sponsor on the need to conduct laboratory studies to determine the accuracy of these model predictions.
2. Since TBHMD appears to be highly toxic in ecosystems and it is also hepatotoxic at low doses, while not required, the sponsor should consider providing data on environmental releases and the potential for worker exposures if such data are available. For example, what are the allowable levels in the workplace and how are workers protected from exposures to TBHMD?
3. The sponsor proposes a combined reproductive/developmental toxicity study. We agree with this proposal, as it will generate appropriate data and at the same time minimize the use of animals.

Thank you for this opportunity to comment.

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